



Container  
Corporation  
of America

Container Division

12005 North Burgard Street  
Portland, Oregon 97203

Phone: 503 286-4411

18 November 1980

*delete TSD?*

Environmental Protection Agency  
Region X  
M-S 530-A  
1200 Sixth Avenue  
Seattle, WA 98101

*ORD 00 9026758*

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Solid Waste Mgmt. &  
EPA Region X

*Gen, TSD*

Re: Container Corporation of America  
Portland Container Plant  
Hazardous Wastes

Dear Sir:

In August 15, 1980, we sent you a notification indicating that our plant might generate and handle hazardous wastes as defined by U.S. EPA regulations. That notification was based on oral comments and instructions from U.S. EPA personnel that companies should file notifications as generators and as treatment/storage/disposal facilities where there was a slightest doubt as to whether they generated any hazardous wastes. Since we believed that the washwater from cleanup of our printing equipment might contain heavy metals in excess of the concentrations specified in 40 CFR Section 261.41, Table I, we elected to file a notification.

At the present time, we are purchasing only low heavy metal inks for our flexo printing operations. In view of the consistently low levels of lead and chrome that we believe are achievable in those inks, we believe that our washwater is not hazardous as defined by U.S. EPA. Moreover, since the washwater at our plant is discharged directly to a public sewer system, we do not operate a treatment, storage, or disposal facility and we have been advised orally by U.S. EPA personnel that such sewer discharges are not subject to the U.S. EPA hazardous waste regulations. We have therefore concluded that further filings for this plant are not required.

If you need additional information, please contact me.

Very truly yours,

L. N. Hallock  
Plant Manager

LNH:em